

# EXHIBIT N

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*[Additional counsel included below]*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' SEVENTH SET OF  
REQUESTS FOR PRODUCTION TO  
DEFENDANT META PLATFORMS, INC.**

1 In accordance with Federal Rules of Civil Procedure 26 and 34, and orders issued by the Court in  
 2 this matter, Plaintiffs, by and through their undersigned attorneys, request that Meta produce for inspection  
 3 and copying, by **March 19, 2025**, the documents and things described below, in accordance with the  
 4 following definitions and instructions. Meta must produce documents and other things described below  
 5 electronically or at the offices of Boies Schiller Flexner, LLP, 44 Montgomery St., 41st Fl., San Francisco,  
 6 CA 94104.

### 7 **DEFINITIONS**

8 As used herein, the following words, terms, and phrases—whether singular or plural, or in an  
 9 alternate verb tense—shall have the meanings ascribed below. Defined terms may not be capitalized or  
 10 made uppercase. The given definitions apply regardless of whether a term in question is capitalized or made  
 11 uppercase. No waiver of a definition is implied by the use of a defined term in a non-capitalized or lowercase  
 12 form:

13 1. “Any,” “or,” and “and”: “Any” should be understood to include and encompass “all”; “or”  
 14 should be understood to include and encompass “and”; and “and” should be understood to include and  
 15 encompass “or.”

16 2. “Data” means content, files, information, metadata, software, or any other digital material,  
 17 including Documents.

18 3. “Document” is used in its broadest sense allowed by Federal Rule of Civil Procedure 34(a),  
 19 and includes:

- 20 • All application logs, command-line history logs (including the .bash\_history file in the user  
 21 home directories of servers used for downloading data), download logs, data processing  
 22 records, usage reports, server logs, network traffic reflecting torrent downloads or uploads  
 23 (including during the leeching and seeding phases), and descriptor files; and
- 24 • All data acquired via torrent clients copied to any data storage solution such as local servers,  
 25 virtual servers, cloud-based storage, including Amazon Web Services S3 synchronization  
 26 logs, data integrity checks, and access control records.



1 any lost or destroyed Document; (5) all document retention and destruction policies in effect at the time any  
2 requested Document was destroyed; and (6) all efforts made to locate any responsive Document that was  
3 lost or destroyed.

4 3. If You object to any item or category of item, Your response shall (a) identify with  
5 particularity each document or thing to which the objection is made and (b) set forth clearly the extent of,  
6 and specific ground for, the objection; and You should respond to the Request to the extent it is not  
7 objectionable.

8 4. If You object that a Document is covered by the attorney-client or other privilege, or is work-  
9 product, You must provide a Privilege Log containing: (1) the name of the Document; (2) the name and  
10 address of the person(s) who prepared it; (3) the person(s) to whom it was directed or circulated; (4) the date  
11 on which the Document was prepared or transmitted; (5) the name and address of the person(s) now in  
12 possession of the Document; (6) the description of the subject matter of the Document; (7) the filename or  
13 pathname of the Document; and (8) the specific nature of the privilege claimed, including the reasons and  
14 each and every fact supporting the withholding, and legal basis sufficient to determine whether the claim of  
15 privilege is valid.

## 16 **REQUEST FOR PRODUCTION OF DOCUMENTS**

### 17 **REQUEST FOR PRODUCTION NO. 137**

18 Documents sufficient to show the installation, usage, configuration, and operation of Torrent Clients  
19 to obtain Data from Online Databases, including the filename, size, file creation time, and file last modified  
20 date of the Data; configuration files or equivalent settings registries, bandwidth logs, work files, and support  
21 tickets; and Amazon Web Services invoices relating to Your data usage, storage, or transfer.

Dated: March 5, 2025

By: /s/ Maxwell V. Pritt  
Maxwell V. Pritt

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